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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

EPIC GAMES, INC.,
Plaintiff, Counter-defendant,
v.
APPLE INC.,
Defendant, Counterclaimant.

Case No. 4:20-CV-05640-YGR-TSH

**MODIFIED SEALING STIPULATION
REGARDING DKT. NOS. 872 AND 893**

Judge: Hon. Yvonne Gonzalez Rogers

Pursuant to Civil Local Rules 7-11 and 79-5, Section 12 of this Court's Standing Order regarding Post-Briefing Omnibus Sealing Procedures, and the Court's Order Regarding the Plaintiff Epic Games, Inc. and Defendant Apple Inc.'s ("Apple," and together, the "Parties") Omnibus Sealing Motion (Dkt. No. 1665), the Parties submit this Modified Sealing Stipulation in connection with the following filings:

1. The Declaration of Carlyn Irwin, attached to Apple's Motion for Entry of Judgment on Indemnification Counterclaim (filed under seal at Dkt. No. 872-5); and
2. Apple's Reply in Support of Motion for Entry of Judgment (filed under seal at Dkt. No. 893-3).

I. Apple's Justification for Requested Sealing

These filings contain confidential and/or competitively sensitive information of the type this Court has previously allowed to remain sealed in this case and for which courts in this District routinely authorize sealing. Generally, the documents contain information relating to Apple's internal billing policies, processes, and systems for conducting litigation, and financial data relating to costs expended by Apple in this litigation. The following table identifies each of the documents at issue with the particular grounds for Apple's sealing request.

Apple operates in an intensely competitive environment, and thus has taken extensive measures to protect the confidentiality of its information. Public access to this information could cause Apple economic harm and put it at a disadvantage with competitors.

II. Sealing Requests

Each of the sealing motions at Dkt. Nos. 872 and 893 were unopposed.

UNDISPUTED REQUESTS TO MODIFY EXTENT OF SEALING					
Dkt. No.	Sealing Party	Portion to be Sealed	Description	Sealing Basis (Supporting Declaration)	Previously Sealed
872-5	Apple	Redactions consistent with the Order at Dkt. No.	Declaration of Carlyn Irwin	Competitively sensitive, non-public	Previous request to seal was

1		1665 and indicated		information	partially
2		in the attached		regarding	granted and
3		version of this		Apple's: (1)	partially
4		document.		internal billing	denied.
5				policies,	<i>See</i> Dkt.
6				processes, and	No. 1665.
7				systems for	
8				conducting	
9				litigation and	
10				managing vendor	
11				billing; (2)	
12				negotiations with	
13				each of Apple's	
14				vendors during	
15				the Epic matter;	
16				and/or (3)	
17				financial	
18				information	
19				relating to costs	
20				expended by	
21				Apple in the <i>Epic</i>	
22				litigation	
23				contained in	
24				declaration. (Dkt.	
25				No. 872-1).	
26	893-3	Redactions	Apple's Reply in	Competitively	Previous
27	Apple	consistent with the	Support of	sensitive, non-	request to
28		Order at Dkt. No.	Motion for Entry	public	seal was
		1665 and indicated	of Judgment	information	partially
		in the attached		regarding	granted and
		version of this		Apple's: (1)	partially
		document.		internal billing	denied.
				policies,	<i>See</i> Dkt.
				processes, and	No. 1665.
				systems for	
				conducting	
				litigation and	
				managing vendor	
				billing; and/or (2)	
				financial	
				information	
				relating to costs	
				expended by	
				Apple in the <i>Epic</i>	
				litigation	
				contained in	
				Reply. (Dkt. No.	
				893-1)	

Pursuant to this Court's sealing procedures detailed in Section 12 of the Standing Order, the following are attached hereto: (i) the redacted versions of the two documents whose sealing the parties seek to modify; and (ii) a Proposed Order On Parties' Modified Sealing Stipulation.

IT IS SO STIPULATED, through Counsel of Record.

Dated: October 8, 2025

Respectfully submitted,

By: /s/ Gary A. Bornstein

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Dated: October 8, 2025

Respectfully submitted,

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E-FILING ATTESTATION

I, Mark Perry, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Mark A. Perry

Mark A. Perry